

**In The Matter Of:**

*Haydn Zeis, Administrator of the Estate of Jordn Miller v.  
Springfield Township, Ohio, et al.*

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*Sergeant Tera Denise Moore  
March 20, 2017*

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IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

Haydn Zeis, Administrator of  
the Estate of Jordn Miller,  
Plaintiff,

vs.

Case No. 5:16-CV-02331-JRA

Springfield Township, Ohio,  
et al.,  
Defendants

- - -

VIDEO DEPOSITION OF SERGEANT TERA DENISE MOORE  
the Defendant herein, called by the Plaintiff  
under the applicable Rules of Civil Procedure,  
taken before me, Whitney Layne, a Notary Public  
for the State of Ohio, at the Springfield Township  
Police Department, 2465 Canfield Road, Akron, Ohio  
44312 on March 20, 2017 at 1:00 p.m.

LAYNE & ASSOCIATES  
6723 COOPERSTONE DRIVE  
DUBLIN, OHIO 43017

1 APPEARANCES

2  
3 MICHAEL HILL, ESQUIRE  
4 EADIE HILL TRIAL LAWYERS  
5 3100 East 45th Street  
6 Suite 218  
7 Cleveland, Ohio 44127  
8 on behalf of the Plaintiff

9 MEL LUTE, ESQUIRE  
10 BAKER DUBLIKAR BECK WILEY & MATHEWS  
11 400 South Main Street  
12 North Canton, Ohio 44720  
13 on behalf of the Defendants  
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March 20, 2017  
Monday Session  
1:00 p.m.

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STIPULATIONS

It is stipulated by and among counsel for the respective parties that the deposition of TERA DENISE MOORE, the Defendant herein, called by the Plaintiff under the applicable Rules of Civil Procedure, may be taken at this time by the notary Whitney Layne; that said deposition may be reduced to writing in stenotypy by the notary, whose notes thereafter may be transcribed out of the presence of the witness; and that the proof of the official character and qualification of the notary is waived.

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1 Q Have you had any Taser uses or  
2 electrical conducted weapon uses?

3 A Yes.

4 Q Since you've had the body camera?

5 A Since the body camera? I don't remember  
6 if it's since the body camera. I don't believe  
7 so.

8 Q And I'm going to ask you a question that  
9 I've asked everybody, okay, as police officers.  
10 How tall are you?

11 A Oh, five four and a half.

12 Q How much do you weigh?

13 A Oh, no, you didn't.

14 MR. LUTE: That's why he prefaced it the  
15 way he did.

16 BY MR. HILL:

17 Q That's right. I have got to be careful.

18 A Do you know what? When I go to the  
19 doctor -- and I just went last week, as I told  
20 you -- I turn around, and I literally face the  
21 opposite direction. So the last time I checked --

22 Q Let's do it this way. Nothing about how  
23 much you weigh now. How much did you weigh back  
24 on September 8th, 2015?

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1           A     Oh, my gosh. I don't know. Like maybe  
2     175.

3           Q     Okay.

4           A     I'm going to guess.

5           Q     Okay. And were you wearing body armor  
6     on September 8th, 2015?

7           A     No.

8           Q     Were you wearing a belt with all your  
9     gear?

10          A     Yes.

11          Q     And Officer Scherer told me those can be  
12     pretty heavy, like 15 pounds?

13          A     Maybe.

14          Q     Is that about how much you expect them  
15     to weigh?

16          A     I wouldn't have thought -- yeah, between  
17     ten and 15 maybe. I never find it heavy like  
18     everybody else, so I don't know.

19          Q     Do you work out?

20          A     Yeah, I do.

21          Q     What do you do to work out?

22          A     I actually just started working out  
23     again, I just want to say. I do now. I didn't  
24     back then. Since I had twins, I didn't work out

CERTIFICATE

State of Ohio :

County of Franklin:

I, Whitney Layne, Notary Public in and for the State of Ohio, duly commissioned and qualified, certify that the within-named TERA DENISE MOORE was by me duly sworn to testify to the whole truth in the cause aforesaid; that the testimony was taken down by me in stenotype in the presence of said witness; afterwards transcribed upon a computer; that the foregoing is a true and correct transcript of the testimony given by said witness taken at the time and place in the foregoing caption specified.

IN WITNESS WHEREOF, I have set my hand and affixed my seal of office at Dublin, Ohio, on this 3rd day of April, 2017.



Whitney Layne

Notary Public - State of Ohio

My Commission Expires: May 4, 2020.

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